

★ DEC 04 2024 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

ZION Alexander

1:24-CV-8083

CIVIL RIGHTS COMPLAINT

42 U.S.C. § 1983

Plaintiff,

[Insert full name of plaintiff/prisoner]

JURY DEMAND

YES ☒ NO ☐

REC'D IN PRO SE OFFICE
DEC 4 '24 AM 10:39
-against-

THE CITY OF New York,
OFFICER, Delores MOSAURITA,
DAMIR, MUJAHODZIC,
ADA, CATINELLA, DANIELLE

Defendant(s).

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I]

- I. **Parties:** (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. **Name of plaintiff** Zion Alexander

If you are incarcerated, provide the name of the facility and address:

G.R.V.C, 09-09 HAZEN STREET, Queens East Elmhurst,
New York, 11370

Prisoner ID Number: 4412303517

If you are not incarcerated, provide your current address:

N/A

Telephone Number: N/A

B. List all defendants. You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1

THE City of New York
Full Name

City of New York
Job Title

City of New York City.
Address

Defendant No. 2

DELORES, MOSAURieta
Full Name

Police officer
Job Title

THE 208th precinct, Long Island City.
Address

Defendant No. 3

DAMIR, MUJAHODZIC
Full Name

Building manager
Job Title

10-46, Drive, Long Island City, 11101

Address

Defendant No. 4

[ADA] CATINELLA, DANIELLE

Full Name

Queens County Assistant District Attorney

Job Title

225-01 Queens Boulevard, Kew Gardens

New York, 11415

Address

Defendant No. 5

Full Name

Job Title

Address

II. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 ½ by 11 sheets of paper as necessary.)

Where did the events giving rise to your claim(s) occur? These Claims Arised
Out of Queen County, Long Island city preteing to AN
Arresst on 20-46 Drive Long Island city 11101

When did the events happen? (include approximate time and date) The Events
Appox Happened on the date oct, 19th, 2023 At
Arcwel 12:15am

Facts: (what happened?) please see Attached paper
work, please and Thanks.

II.A. Injuries. If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

Several violations To my Federal and civil rights,
Loss of wages, unusal punishment, Harassment etc....
pertain To Attached paper work

I Zion Alexander, wishes to respectfully Ask
The Court, TO AMEND my Claim (1:24-CV-8083)
And update my Argument, Claims and, add defendants with
A few attached Exhibits, with all due respect, for the
reasons of Time Constraints with me dealing with a pending Criminal matter,
with my Liberty At restraint. Its very time constraining to obtain my
Discovery paper work from Criminal matters to oppose And Show its
Evidence In this matter Thankyou so much. May you Also send
A Copy of my original complaint please.

To Consider Please:

Federal Rule Civil procedure 15(a)

- Amendment Before Trial -

A party may Amend its pleading once As a matter
of course no later than:

21 days after serving it, or 21 days After service of Response
or After A motion Rule 12(B), (E) or (F)

Rule 15(a)(2): "Directs A Court to Freely grant leave to Amend
when Justice so requires"

In my Amended Claim I wish to add [Counts] Against
Defendants: ("If claim Already exist^{In original claim}, Please ignore duplicate claims")

Malicious prosecution (i), False Arrest (ii), Fabrication of Evidence (iii),
Failure to intervene (iv), Municipality liability under *Monell v Dep't of Soc. Servs.*
436 U.S. 658 S. Ct, violating article 186 (due process article § 11.
Failure to train, Supervise and discipline (v)

I wish to add Defendants, If the Court so wishes
to Affirm my Amendment:

* NEW Defendants to Add:

~~██████████~~; DAMIR, MUJAHODZIC

A.D.A.; CATINELLA, DANIELLE

"To initiate a prosecution a defendant must do more than report the crime or give testimony he must play an active role in the prosecution such as giving testimony or importing the authorities to act

(please see. Rohman v. New York City Transit Authority 214 F.3d at 130)

↕ Relating to * New Defendants *

- The witness from Queens Suprem Ct matter ("DAMIR, MUJAHODZIC") is the only ("complain witness") of matter, who is not the actual owner/dweller of dwelling he contends to protect, but falsely arises a felony complaint of Apt 306, and is NOT an direct witness either. But continued to complain to arresting officer (DELORES, MOSAURIETA) who gave to ADA (DANIELLE, CATINELLA) who then and should have known about faulty ruling that came from testimony of ~~the~~ complain witness at the Grand Jury, that also completely lacked any physical evidence of a burglary ~~that~~ taken place, occurring ~~fraud~~ FRAUD (please see. Manbaniello v. City of New York 612 F.3d 149) AS A RESULT OF FRAUDULENT Grand Jury ruling, the Grand Jury's ruled that the complain witness must have been the one

who was Burglarized, which is inconsistent with the original Complaint, (Changing The Roles From Complaining witness to victim.) which only could have been done through A Continuous prosecution with Malicious Intent and malice. Without further Investigation The ADA should have been knowledgeable of Error and willing to Fix issue But continuously ignored the Issue Because The states policy ~~is~~ allows Illegal Arrest to occur. by allowing the DA/ State/ police to Arrest Anyone Against frivolous Hearsay "Felony Complaints", which lack Any Truth or Facts only "Accusations". (Please see. Pinsky v Duncan 79 F.3d 306, 313 (2d Cir 1996))

↳ The prosecution complained improper wrongful motives or in reckless disregard of Plaintiff's right According to the prosecution they have been ⁱⁿ continued communication to continue and initiate false charges Against plaintiff (Zion Alexander).

Due to the ADA ("DANIELLE, CATINELLA") misconduct, she supported and relied on conclusions that probable cause was lacking due to the Grandjury that was held in fraud, A Grandjury Indictment creates a presumption of probable cause that may be rebutted only by evidence that the indictment was procured by fraud, perjury The suppression of evidence or other police conduct undertaken in bad faith.

(Please see. Buari, 530 F Supp. 3d at 384) Quoting (Maganelli, 612, F3d at 162)

I Also Continued to show ample evidence to continue this matter under Any federal rule that permits even though my Criminal matter has not rule yet in my FAVOR (Disposition) Based on its continuance should have halted (stopped) for the reason That my Criminal matter may be rendering under Faulty Indictment

I positively In other words state that the Indictment Indirectly Charging me Against MR. DAMIR, MUJAHODZIC, who originally stated nothing About Bein the Actual victim of A Burglary, which In this case would make the felony Complaint that originally Incorporated me Invalid. What happened to the original victim ("ABDUL, JAMEL: Owner & Dweller of Apt 306)? why did the Indictment Rule and only charge me Against "DAMIR, MUJAHODZIC", with Burglary In the First two Counts IF HIS Testimony and Role was a Complaining witness, standing FOR the victim's (Behalf) ~~nothing~~ Please note (ABDUL) The original victim of said Burglary, never testified at Grand Jury or Initiated A Complaint Against me In the First place?

BASED on These FACTS, my Criminal matter (Zion Alexander v People Ind. 749017) should not have Continued on A Fraudulent Indictment In other words defective § C.P.L. 210.20 The ADA Role In this is Deliberate on the fact that They should have known of this Error and prevented it. So I HAVE NO other choice to believe In the deliberate Indifferent Care and Approach of the Case. I pray and hope this Court will believe such is true and move on To the next stage of proceeding. Even though my Criminal matter is still pending. IF my Queens ADA, would have dismissed the indictment on these factual Errors, the procedure would have disproportioned in my Favor. Finally I wish to Adopt this Argument in total and add it to my Current Claim IF the honorable Justice, so Allows it. Yes I ~~already existing~~ only wish to Adopt this Claim and add it to my already existing Claim (1:24-CV-8083) For these claim co-Respond with each other and relevant to the original. Forgive me for I Plead for Courtesy of the Court. Respectfully. Z. A. (Plaintiff) 4

OTHER FACTS To Consider
1:24-CV-0083

FACT To Consider

1 of 3

11/16/2024

(PLEASE ALSO SEE: BERTUGLIA, 839 F Supp. 2d AT 739)

- where A Assistant district Attorney commits misconduct
Before A Grandjury that results in AN indictment based on insufficient
evidence, OR violates their obligations under Brady those actions
will frequently result in the violation of citizens Constitutional Rights

(See. Buari v City of New York 530 F Supp 3d 356)

In ~~Bertuglia~~ Buari, He Alleges the Bronx DA officials
plainly knew to A moral certainty that ADA's would make
probable cause assessments offer testimonial evidence in court
confront false or misleading testimony and acquire Brady which
are the basic jobs of the ADA's job [Buari pleaded a failure
by the Bronx DA to train, discipline and supervise, Relying on
plausibly Alleging deliberate Indifference Theory]

BASED on superficial overwhelming facts

- This case is ~~very~~ ^{is} similar to me which
Arresting officer withheld evidence of innocence then relayed
and gave ADA, Contradictory testimony, herself and from DAMIR,
whom altogether still continued to prosecute me, Her
Involvement proves alone that the ADA in my case also
knew to A moral certainty of errors, which all ARE the
prosecution deliberate plan to incarcerate me against my will
to sabotage my character and liberty illegally - which is
A Direct Infringement of Constitutional Rights ETC... 4th Amendments...
Due process ... - ETC ALL ABOVE - At the same time seriously
Effecting my right to A ("Fair Speed trial / Fair trial")

OTHER FACTS to Consider

11/16/2024 2 of 3

Approx: Dates And Times: of matter

THE TWO DEFENDENTS I wish to ADD to my original claim ("1:24-CV-8083") who ARE Queens County ADA ("CATINELLA, DANIELLE") And ("DAMIR, MUJAHODZIC") are defendants that arose from my Queens Supreme Court matter (People v Alexander) IND # 74094-23/001, (Docket # CR-050633-23QN), the two defendants initiate started A prosecution Against me approx: ON October 16-19th, 2023 (12:15 AM) By Building manager of 10-46 44 Drive, County of Queens New York, 11101 who's name is "DAMIR, MUJAHODZIC", made and signed Fivok's Felony Complaint Erroneously Against A Dwelling that NOT HIS, where He continued to urge the ADA, "CATINELLA, DANIELLE" to maliciously prosecute, plaintiff "Zion Alexander", By withdrawing Exculpatory Evidence from being presented At Grand Jury to Ratify and Coerce, fraudulently Rule out An Indictment In Her FAVOR. For Example NOT showing the Grand Jury the Body Cam Footage of Apprehension that clearly showed the Exculpatory Evidence.... ETC.... NYS Identification cards of possible multiple suspects, Erroneously misidentifying and Arresting Zion Alexander (plaintiff) as one of those multiple suspects under the name "Denzell, Alexander" and other important facts like the credit cards originally been reported stolen from A CAR NOT victims, "House/Dwelling" please request and see Discovery from (People v Alexander #74094/23 001) [Body Cam Footage] All which went Against my FAVOR, where ADA may have been carrying out her job duties, she should HAVE known or known of "False and Fraudulent" Testimony / Evidence because the Bodycam clearly show it and MR. Damir's common inconsistent testimony against original Complaint, I hold the Queens ADA fully liable of their knowing actions who hide and rely's ON The State of New York Faulty policies, that allows one to Be Arrested for A jury decision. Based on Accusatory Instrument that bears no merit!

1: 24-cv-8083

FAET to consider
3 OF 3

Other FAETS to Consider: Continued

11/16/2024

- By relying on the states faulty policy The ADA Also plays A role Is denying me A Fair Trial (my Federal Right) and violates my Constitution Right of Due process while the state failure to Train, Supervise and discipline prosecutors Is A direct result from A By Indirectly/directly Allowing NYS to prosecute on Faulty Felony Complaints. (Or what ever other policy that just seems proper") And For Defendants role "DAMIR, MUJAHODZIC" who started the False Arrest By going out his way to fabricate report about ABurglary on victims behalf. Violating Due process and Fairtrial Rights By fraud and False Arrest to deliberately deprived my Liberty and Life without Fair due process (Constitutional right) For his personal reasons, Dating From Oct 19th to Today (Current date)

Even though this §1983 claim Arose ~~out~~ out of A pending Criminal matter (Alexander, ^{the} Zion v People 74094-23/001) which the disposition may not be ruled yet, I ask this Court to consider my ~~the~~ Actual Innocence on A Rebuttal FAET of Fraudulent Grand Jury and Faulty Indictment § 210.20 proceeding that would of Stop my case by dismissal on these grounds thereby ruling A Favorable disposition of Criminal matter.

Please SEE (Bauri, 530 F.3d at 384) quoting (Maganicello, 612, F.3d at 162)
Please SEE (Ricciardi v NYC Transit Authority 124 F.3d 123, 130 (2nd Cir 1997))
Please SEE (People v VELAZ, 137 AD3d A 133)

Respectfully

Alexander, Zion

1:24-CV-8083

Motion

1 of 3

My motions TO CONSIDER 11/16/2024

I Respectfully with my upright Seldom Inquisited
Inquire the Court to peacefully and respectfully
Seek out my Motion OF A "TRO".

I peacefully Ask for This Court to Grant A "TRO"
BASED on the "Extraordinary Circumstances Exception" In with
"The BAD Faith Exception", To the "Younger Abstention doctrine"
please see (JACKSON HEWITT TAX SERV. INC v KIRKLAND 455 App'x 16, 18 (2d Cir 2012,

The STATE/DA/my arresting officer only seeked to fulfill their
job quota By Appears necessary by seeking out "poor minorities"
who may not afford representation and who fight everyday to simply
exist, By Abusing Accusatory Instruments to the fullest and simply
Arresting the Accused/The plaintiff, knowing that such Accusatory
Instrument only BEARED "Hearsay" Testimony where Everyday Battle
The plaintiff is Harassed By Illegitimate motives that goes
Against "Justice" and New York STATE policy (By violation the NYS
police "protect and serve" Rule) where my Arresting officer knowingly
withheld exculpatory evidence and Forwarded report to ADA to
fulfill her job duties "Tintedly". I most seemingly seek out
A Tangible Remedy to Combat this Error Before A Jury,
To Hopefully catch the problem Early on. But NY Cpl seems
to NOT BEAR Any rule to Allow to Bring up to Contest
(False Arrest, Faulty Indictment procured by Fraud, Malicious prosecution,
malice, Fabrication of evidence ... etc) These Errors Early on or
when they may Have occurred. In This Case It Happened Before

A Disposition of A Case. New York constantly expects its Citizens and accused to "continue on the matter regardless of the violation, ~~before~~ one ^{MAY} ~~may~~ contest anything. (Appeals and exhaust all possible remedies) This should not always be the case, where in my case, it's clearly evident the errors occurred to hide my innocence, where one state/DA/A.D. can manipulate the outcome against my favor, to meet their quota resulting in a easy win on their end, which therein it's self is a violation of a fair trial, one should NEVER wait, to correct a error of anylaw, AT any commencement of a criminal matter, it would be unconstitutional in it's self, to continue to overlook such things. "wrong is wrong", "FACT ARE FACTS", IF any party is seeking to rule out a ruling by fraud and malicious intent of any kind shall be held responsible for their actions or atleast FOR them, then and there NOT later. So I Ask the Court to openly how ever they seem just or proper, Intervine in my pending criminal matter, Held AT 125-02, ^{BLVD} Queens, New Guards, Supreme Court of Queens County 11415 (Indictment #74097-23/002) To stop the suffering that this Federal Court can prevent.

please SEE (Diamond "D Constr. Corp v ^{McGowan} ~~McGowan~~, 282 F3d 191 (2nd Cir 2002)
 please see (Trainor v HERNANDEZ, 431 US 434, 44142, 97 S Ct 1911
 522 ED 2d 486, § N 7 (1977)

A Continuation of my criminal matter would definitely result in malicious prosecution or worse a wrongful conviction... ETC... The Grand jury was already proceed by improper references

TRO Continued

And Fraud by deception leading by the ADA - where
Lack of Evidence to constitute a Burglary were shown.
Also false testimony from DAMIER was also presented,
the the Grandjury charged me Indirectly Against the
Complaining witness "DAMIER" who's not the tenant or
victim in the Immoderate case. All these fact have
happened Against the plaintiff, which constituted a
Fraudulent, Invalid Indictment (Lack of probable cause
to commence a prosecution) so by proving the lack
of probable cause and deliberate continuation of prosecution
knowing, is a Rebuttal it's self to cover and
allow a higher court/federal court to intervene to
stop the injustice that already happen and preserve any
rights left to plaintiff by intervening in the name
of justice. There on I respectfully ask the courts
for a grant of my motion, Thankyou

x Zura Alarba
Plaintiff

I ZION Alexander, (Plaintiff) Highly states The Needing
OF A FEDERAL "TRO" To Halt my pending Criminal matter
In Queens Supreme Criminal Court (People v Alexander) IND# 74094-23/007
Due, To It's Existence Causing me Irreparable Harm that could unjustly
Strip him of His Federal and civil rights by defenatrons, And highly discriminatory
Actions by The Arresting officer, ADA, Complaining witness and more.
Also As A "Habeas Corpus Petitioner", that alleges a violation of (1st Amend),
Fourth and Fifth AMENDMENTS, \$190.50 violation where my waiver of Grandjury
was procured By Fraud and Against my will. where their in the ADA
went out of her way To falsely lead Grandjury to rule out An
OBVIOUS False/fraudulent Indictment Against the Lacking Evidence to
Fully satisfy and secure/constituting The Element of Burglary 2nd, Thus
Creating ¹ Extraordinary Circumstances, where A Eminent Cure Is Extengintly
Needed To halt such Bad Faith proceeding from Continuing.
Please SEE (People v SOSA, 2021, NY Slip Op 50519[C] App term 2d Dept. 2021)
I Plaintiff Bring This Argument In Hopes of Through this districts
Court Relife, To Appoint me A Special Master to oversee
my pending Criminal matter, or othe remedy deemed appropriate
By Said Justice, For Halting This "Judicial Hopscotch".
Please see James v Bellotti, 733 F.2d 989, 993-94 (1st Cir 1984)

Thankyou so much,

Respectfully,
Zion Alexander

Exhibit "A"

Is The original Complaint, In the state of New York
County of Queens. Docket # (CR-030633-23QN)

Please Refer To Page # 2, second paragraph,
Clearly states that CW: Is DAMIR, MUJAHODZIC,
who [Depicts/view] the defendant on OCT 17th, 2023

Enter the living room of APT #B306, "which is the residence/dwelling
of Complainant "ABDUL, Javed"

Please Refer To Paragraph # 1:

"Complaint Damir Mujahodzic who is A Superintendent of the
Above mentioned location

Please Refer To Page # 3, Paragraph # 2
Complaint, Abdul Javed is legal Custodian of Credit cards and
Apartment # B306.



AFFI10647661061041

Q23640552

CRIMINAL COURT OF THE CITY OF NEW YORK
PART APAR, COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK

V.

ZION ALEXANDER (24Y)
12541586Y

DEFENDANT

STATE OF NEW YORK
COUNTY OF QUEENS



POLICE OFFICER DOLORES MOSAURIETA OF 108TH PRECINCT, TAX REG#: 970721, BEING DULY SWORN, DEPOSES AND SAYS THAT BETWEEN OCTOBER 16 2023 8:50AM AND OCTOBER 19 2023 12:15AM, INSIDE OF 10-46 44 DRIVE, COUNTY OF QUEENS, STATE OF NEW YORK, THE DEFENDANT COMMITTED THE OFFENSES OF:

- PL 140.25-2 [CF] BURGLARY IN THE SECOND DEGREE
 PL 140.20 [DF] BURGLARY IN THE THIRD DEGREE
 PL 155.30-4 [EF] GRAND LARCENY IN THE FOURTH DEGREE (3 COUNTS)
 PL 165.45-2 [EF] CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE (3 COUNTS)
 PL 140.15-1 (11/1/2010) [AM] CRIMINAL TRESPASS IN THE SECOND DEGREE/DWELLING
 PL 155.25 [AM] PETIT LARCENY
 (PL) 165.40 [AM] CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FIFTH DEGREE

PL 140.25-2 [CF] BURGLARY IN THE SECOND DEGREE
 --- KNOWINGLY ENTER OR REMAIN UNLAWFULLY IN A BUILDING THAT WAS A DWELLING WITH INTENT TO COMMIT A CRIME THEREIN;

PL 140.20 [DF] BURGLARY IN THE THIRD DEGREE
 --- KNOWINGLY ENTER OR REMAIN UNLAWFULLY IN A BUILDING WITH INTENT TO COMMIT A CRIME THEREIN;

PL 155.30-4 [EF] GRAND LARCENY IN THE FOURTH DEGREE (3 COUNTS)
 --- KNOWINGLY AND UNLAWFULLY STEAL PROPERTY CONSISTING OF A CREDIT CARD OR DEBIT CARD;

PL 165.45-2 [EF] CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE (3 COUNTS)
 --- KNOWINGLY POSSESS STOLEN PROPERTY CONSISTING OF A CREDIT CARD, DEBIT CARD OR PUBLIC BENEFIT CARD WITH INTENT TO BENEFIT HIMSELF OR A PERSON OTHER THAN THE OWNER THEREOF OR TO IMPEDE THE RECOVERY BY THE OWNER THEREOF;

PL 140.15-1 (11/1/2010) [AM] CRIMINAL TRESPASS IN THE SECOND

Complaint

PAGE 2



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ALEXANDER, ZION Q23640552
DEGREE/DWELLING

--- KNOWINGLY ENTER OR REMAIN UNLAWFULLY IN A DWELLING;

PL 155.25 [AM] PETIT LARCENY

--- KNOWINGLY AND UNLAWFULLY STEAL THE PROPERTY OF ANOTHER;

PL 165.40 [AM] CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FIFTH DEGREE

--- KNOWINGLY POSSESS STOLEN PROPERTY WITH INTENT TO BENEFIT HIMSELF OR A PERSON OTHER THAN THE OWNER THEREOF, OR TO IMPEDE THE RECOVERY BY AN OWNER THEREOF.

THE ABOVE OFFENSES WERE COMMITTED AS FOLLOWS:

① DEPONENT STATES THAT SHE IS INFORMED BY COMPLAINANT DAMIR MUJAHODZIC, WHO IS A SUPERINTENDENT OF THE ABOVE MENTIONED LOCATION, THAT HE HAS REVIEWED SURVEILLANCE VIDEO THAT DEPICTS THE DEFENDANT, ZION ALEXANDER, ON OCTOBER 16, 2023, AT APPROXIMATELY 10:44PM, OPEN THE DRIVER'S SEAT DOOR AND TRUNK OF A PARKED 2019 WHITE TOYOTA MOTOR VEHICLE, LICENSE PLATE # JHB9412, IN THE PARKING GARAGE OF THE ABOVE MENTIONED LOCATION, RUMMAGE THROUGH SAID VEHICLE, THEN WALK AWAY FROM SAID VEHICLE.

② DEPONENT FURTHER STATES THAT SHE IS INFORMED BY COMPLAINANT DAMIR MUJAHODZIC THAT HE HAS REVIEWED SURVEILLANCE VIDEO THAT DEPICTS THE DEFENDANT, ON OCTOBER 17, 2023, AT APPROXIMATELY 8:50AM, ENTER INTO THE LIVING ROOM OF APARTMENT #B306 OF THE ABOVE MENTIONED LOCATION THROUGH SAID APARTMENT'S FRONT DOOR, WHICH IS THE RESIDENCE OF COMPLAINANT ABDUL JAVED.

③ DEPONENT FURTHER STATES THAT SHE IS INFORMED BY COMPLAINANT DAMIR MUJAHODZIC THAT HE HAS REVIEWED SURVEILLANCE VIDEO THAT DEPICTS THE DEFENDANT, ON OCTOBER 17, 2023, AT APPROXIMATELY 9:28AM, EXITING THE STAIRWELL AND WALKING INTO THE LOBBY OF THE ABOVE MENTIONED LOCATION, THEN EXITING SAID LOBBY THROUGH THE FRONT ENTRANCE.

④ DEPONENT FURTHER STATES THAT ON OCTOBER 18, 2023, AT APPROXIMATELY 10:50PM, SHE OBSERVED THE DEFENDANT LAYING DOWN AND SLEEPING IN THE LIVING ROOM OF APARTMENT # B602 INSIDE THE ABOVE MENTIONED LOCATION.

⑤ DEPONENT FURTHER STATES THAT SHE RECOVERED ONE (1) DISCOVER CREDIT CARD, TWO (2) CAPITAL ONE CREDIT CARDS, AND ONE (1) CHASE BANK CREDIT CARD, AND ONE KEY THAT UNLOCKS APARTMENT #B306 ON THE KITCHEN COUNTERTOP NEAR WHERE THE DEFENDANT WAS OBSERVED LAYING DOWN INSIDE APARTMENT # B602.

⑥ DEPONENT FURTHER STATES THAT SHE IS INFORMED BY COMPLAINANT DAMIR MUJAHODZIC THAT HE IS A LEGAL CUSTODIAN OF THE ABOVE MENTIONED BUILDING, INCLUDING APARTMENTS # B602 AND B306, THAT ON THE ABOVE MENTIONED DATES APARTMENT # B602 WAS VACANT, THAT ON A DATE PRIOR TO OCTOBER 16, 2023 HE TOLD THE DEFENDANT HE WAS NOT ALLOWED INSIDE THE ABOVE MENTIONED LOCATION AND THAT THE DEFENDANT DID NOT HAVE PERMISSION OR AUTHORITY TO ENTER SAID LOCATION, INCLUDING THE ABOVE MENTIONED APARTMENTS, OR REMAIN THEREIN.



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ALEXANDER, ZION Q23640552

① DEPONENT FURTHER STATES THAT SHE IS INFORMED BY COMPLAINANT ABDUL JAVED THAT HE IS A LEGAL CUSTODIAN OF THE ABOVE MENTIONED MOTOR VEHICLE AND KEY, THAT AT APPROXIMATELY 11:00AM ON 10/17/2023 HE OBSERVED THAT SAID KEY WAS MISSING FROM INSIDE SAID VEHICLE, AND THAT THE DEFENDANT DID NOT HAVE PERMISSION OR AUTHORITY TO TAKE, REMOVE, POSSESS, OR EXERCISE CONTROL OVER SAID MOTOR VEHICLE AND KEY.

② DEPONENT FURTHER STATES THAT SHE IS INFORMED BY COMPLAINANT ABDUL JAVED THAT HE IS A LEGAL CUSTODIAN OF THE ABOVE MENTIONED DISCOVER CREDIT CARD, CAPITAL ONE CREDIT CARDS, AS WELL AS APARTMENT # B306 IN THE ABOVE MENTIONED LOCATION, THAT ON 10/17/2023 AT A TIME PRIOR TO 8:50AM HE OBSERVED THE ABOVE MENTIONED CREDIT CARDS INSIDE A DRAWER INSIDE SAID LOCATION, AND THAT THE DEFENDANT DID NOT HAVE PERMISSION OR AUTHORITY TO TAKE, REMOVE, POSSESS, OR EXERCISE CONTROL OVER SAID ITEMS, OR HAVE PERMISSION OR AUTHORITY TO ENTER INSIDE OF SAID APARTMENT, OR REMAIN THEREIN.

FALSE STATEMENTS MADE IN THIS DOCUMENT ARE
PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT
TO SECTION 210.45 OF THE PENAL LAW

10/19/23 *D. L. White*
DATE SIGNATURE

SWORN TO BEFORE ME ON THE
DAY OF

DATE SIGNATURE

Exhibit "B"
(Grand Jury minutes)

REFER TO PAGE # B, Lines (9-10)

Lines 9-10: "Clearly Tell's us what the role and who Damir Muhadzic, IS."

Refer To Page # 4, Lines (8-10)

Lines 8-10: Tell's ~~us~~ what A Residence Manager does.

[NOTE, How He does NOT claim he IS A victim of A Burglary]

Refer To Page # 9 Lines (19-25) AND Page # 10 (Lines, 1-3)

^{#9} Lines (19-25): Talk's About A door being unlock with in this case IS
A vacant Apartment, which does NOT constitute A Charge of Burglary 2nd degree
^{Page 10} Lines (1-3): MR. DAMIR (CW), Explains why He leaves this Apt unlocked,
possibly Anyone or Anybody has Access to it thereby.

Refer To Page # 10, (Lines 12-13)

Lines: (12-13) Explains A Lie where I was Not fard sleeping
wearing No Jacket NOR was I wearing Any BookBag, ALSO I
was NOT wearing Any sneakers, when they entered the Apt.
* NOTE You can depcte this Allegation By viewing Police Body cam

Refer To Page # 13 (Lines 18-19) (Lines 21-24)

Lines (18-19): Police officer #6002 Also states me wearin Black Jacket,
Red BookBag

Lines (21-24): Then she changes the state-ment to saying The BookBag
was In Another room to the left.

Exhibit B
(Grand Jury minutes) * Continued

REFER TO Page #18

(Lines 1-25) : Clearly despite ABdul Jameel NEVER showed
TO Grand Jury, AND NEVER Gave Testimony of
AN Actual Burglary Taken place Against HIS
Dwelling, APT # B306, I doas however claim
The ADA Presented A sworn Disposition of
supporting the theft of HIS credit cards,
~~etc~~ which were NOT in my physical
possession.

Please Note in the copy of this Grand Jury minutes.
That was Given to me NEVER, showed or Talked About
An specific Burglary Taken place At All?, No Evidence of
An Burglary Even was showed or Reported of, At All!
It Isn't Even Clear who was the victim of one
If there was A crime of Burglary Been taken place, Im still
Overly shocked How AN Jury Even Ruled to vote AN
Indictment on A Burglary Charge, unless The ADA, committed
Fraud by leading the jury Improperly, on that NOTE, please
Continue To Exhibit # C,

1 DAMIR MUJAHODZIC, residing in
2 QUEENS COUNTY, was called as a witness, having first
3 been duly sworn, testified as follows:

4 BY MS. CATINELLA:

5 Q. Good morning, Damir.

6 A. Good morning.

7 Q. Damir, how old are you?

8 A. I'm 44.

Line 9 Q. What do you do for a living, sir?

Line 10 A. I'm a residence manager.

11 Q. Where are you a residence manager of?

12 A. 10-46 44th Drive in Long Island City and also
13 46-09 11 Street in Long Island City.

14 Q. You mentioned 10-44 44th Drive. That's in Long
15 Island City, right?

16 A. Correct.

17 Q. Can you please describe that building?

18 A. That building has two towers. They're pretty
19 much designated, but they do connect through the garage
20 and through the gym. Otherwise, they're pretty much
21 designated to its own two different towers.

22 Q. Do those two towers also go by the address of
23 10-46 44 Drive?

24 A. Yes.

25 Q. And you mentioned that's in Long Island City?

1 A. Correct.

2 Q. That's here in the County of Queens?

3 A. Yes.

4 Q. And what do you do in your role as -- how would
5 you describe a residence manager? Residence manager --
6 what are your duties and responsibilities as a
7 residence manager in that building?

Line 8 A. I basically maintain the building. I have a
9 staff on hand, you know, day to day issues that may
Line 10 arise.

11 Q. As part of your duties, do you maintain and
12 review the video surveillance contained within that
13 building?

14 A. I do.

15 Q. And to your knowledge, do those video
16 surveillance cameras maintained within that building --
17 are they fair and accurate in their recordings?

18 A. Yes.

19 Q. Do they have timestamps on them?

20 A. Yes.

21 Q. Where specifically are there video cameras placed
22 throughout the building?

23 A. Throughout all of the common areas.

24 Q. Would that also include the lobby through the
25 garage area as well?

1 A. Yes.

2 Q. That building, 10-46 44 Drive, how do you access
3 the inside of the building from the street level? How
4 do you get in?

5 A. You have two towers. Basically through the
6 lobby.

7 Q. Is there a key or some sort of access card in
8 order to enter the building or --

9 A. A key fob.

10 Q. And who has those key fobs?

11 A. Residents and myself and the staff.

12 Q. Now, Damir, in line with your duties as a
13 residence manager of the building 10-46 44 Drive, did
14 you review and download video surveillance from the
15 lobby on October 17, 2023 at approximately 9:28 a.m. and
16 the lobby on October 18, 2023 at approximately 10:50
17 p.m. as well as two cameras from the garage area on
18 October 16, 2023 at approximately 10:40 p.m.?

19 A. Yes.

20 MS. CATINELLA: And I'm going to deem this
21 marked Grand Jury 1 for identification.

22 Q. Do you recognize this?

23 A. Yes.

24 Q. What do you recognize that to be?

25 A. The surveillance footage of what I saw earlier in

1 your office.

2 Q. That video surveillance footage that I just asked
3 you about, the lobby area and garage?

4 A. Yes.

5 Q. From those particular dates and times?

6 A. Yes, correct.

7 Q. You mentioned that you reviewed that in my
8 office?

9 A. Yes, correct.

10 Q. Does it contain a fair and accurate recording of
11 those videos that you reviewed and downloaded from those
12 locations and times?

13 A. Yes.

14 MS. CATINELLA: With that, I ask that this
15 be deem marked Grand Jury 1 in evidence. I'm now
16 going to play what is in the evidence as Grand
17 Jury 1. I'm going to play the first video
18 contained on the CD labelled Garage North Side
19 October 16, 2023.

20 (WHEREUPON A VIDEO WAS PLAYED.)

21 Q. Damir, looking at the screen here, can you see?

22 A. Yes.

23 Q. Looking at the screen here, what area is depicted
24 here?

25 A. That's the garage area.

1 Q. Specifically, what side of the garage area?

2 A. It's the north side.

3 MS. CATINELLA: Okay. I'm going to continue
4 playing this video.

5 (WHEREUPON A VIDEO WAS PLAYED.)

6 Q. Is there anything at this portion of the video --
7 I stopped it at 17 seconds -- Damir, that caught your
8 attention?

9 A. Yes.

10 Q. Can you please tell the members of --

11 A. The gentleman, he exited the vehicle and also
12 opened up the back gate of the vehicle.

13 Q. And what -- can you please describe what this
14 individual is wearing?

15 A. He was wearing a black jacket, a red bookbag and
16 white sneakers.

17 MS. CATINELLA: I'm going to continue
18 pressing play. I'm now going to play what's on
19 the CD as Garage South Side, October 16, 2023.

20 Q. Looking at this video, what is this location?

21 A. That's entering from tower B in the south side.

22 Q. In what portion of the building?

23 A. In the garage area.

24 Q. Is this just another view of what we just
25 previously saw?

1 A. Correct.

2 Q. In a different angle?

3 A. Correct.

4 MS. CATINELLA: So now playing that.

5 (WHEREUPON A VIDEO WAS PLAYED.)

6 Q. And looking at the video that is depicted on the
7 screen here, what is it about him that caught your
8 attention?

9 A. The outfit that he was wearing.

10 Q. And what specifically is he wearing here that we
11 can see?

12 A. I mean --

13 Q. Do you need to get up and --

14 A. Can I get a little closer? Just -- he has the
15 black jacket and the white sneakers and the bookbag.

16 MS. CATINELLA: Okay. I'm now playing
17 what's labeled as lobby, October 17, 2023.

18 Q. Damir, what are we looking at here? What
19 location?

20 A. He's exiting the building in tower B.

21 Q. What location are the buildings that we are
22 talking about?

23 A. The lobby.

24 Q. And say he's -- what is this individual wearing
25 in this still image here?

their completely
leading him on

EXHIBIT B

K. S. 9

Page 9

1 A. White sneakers, red bookbag and black jacket.

2 MS. CATINELLA: Okay. Pressing play. Now
3 I'm playing what's labeled as Lobby, October 18,
4 2023.

5 Q. Damir, what location are we looking at here?

6 A. Tower A, lobby.

7 MS. CATINELLA: Pressing play.

8 (WHEREUPON A VIDEO WAS PLAYED.)

9 Q. Damir, is there anything specific about what this
10 individual is wearing here that caught your attention?

11 A. He's wearing the same exact outfit as previously.

12 Q. Damir, I'm going to direct your attention to
13 October 19, 2023 at approximately midnight. Did you
14 have an opportunity to be inside of the unit B-603 --
15 excuse me, 602, within building 10-46 44 Drive?

16 A. I did.

17 Q. And who did you go into that unit with?

18 A. With the police officers.

Line 19 Q. Was that door locked or unlocked when you entered
20 that unit?

21 A. The door was locked.

22 Q. Was that unusual?

23 A. Yes.

24 Q. Why was that unusual, that that particular unit
Line 25 was locked?

Line 1 A. Well, currently, that's a vacant unit. So we
2 leave it unlocked for an agent to show throughout the
Line 3 day and everything. That door is left unlocked.

4 Q. When you entered into that unit with the police
5 officers, what, if anything, did you observe?

6 A. I observed an individual. He was in the living
7 room. It appeared like he was sleeping and he had all
8 his belongings spread out over the counter top in the
9 kitchen.

10 Q. What was that individual wearing when you
11 observed him within this unit?

Line 12 A. ~~X~~ He was wearing the jacket, sweatpants and the
Line 13 ~~X~~ white shoes. The bookbag was on the side by the
14 countertop.

15 Q. Can you please describe what that bookbag looked
16 like?

17 A. It was a red bookbag.

18 Q. Now, Damir, as the property manager for that
19 building, are you the custodian for the building and the
20 units within it?

21 A. I am.

22 Q. Did you give this individual that was sleeping
23 inside the unit B-602 permission or authority to enter
24 the building?

25 A. I did not.

1 Q. Did you, as well, give that individual permission
2 or authority to enter within the unit B-602?

3 A. I did not.

4 MS. CATINELLA: I have no further questions
5 of this witness. Do any members of the jury have
6 any questions? Seeing no hands and hearing no
7 voices, the witness is excused. Thank you,
8 Damir, for your time today.

9 (WITNESS EXCUSED)

10

11 MS. CATINELLA: You will next hear testimony
12 from Police Officer Mosaurieta.

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1 POLICE OFFICER DOLORES MOSAURIETA,
2 SHIELD NUMBER 6002, 108 PRECINCT, was called as a
3 witness, having first been duly sworn, testified as
4 follows:

5 BY MS. CATINELLA:

6 Q. Good morning, Officer.

7 A. Good morning.

8 Q. Do you want to hold it? Like that.

9 Who do you work for?

10 A. For the NYPD.

11 Q. How long have you worked for the NYPD?

12 A. For almost three years.

13 Q. Where are you currently assigned?

14 A. The 108 Precinct.

15 Q. What is your title within the 108 Precinct?

16 A. Police Officer.

17 Q. What are some of your duties and responsibilities
18 as a police officer assigned to the 108 Precinct?

19 A. I patrol the streets. I work for midnight which
20 is from 11:15 p.m. to 7:50 in the morning.

21 Q. I'm going to direct your attention to October 19,
22 2023, at approximately midnight. Did you have an
23 opportunity to be at 10-46 44 Drive?

24 A. Yes.

25 Q. Is that location in Queens County?

1 A. Yes.

2 Q. What brought you to that location?

3 A. We had a criminal trespass in progress for a male
4 black wearing a black jacket and red bookbag.

5 Q. What did you do once you got to that location?

6 A. I spoke to the superintendent in the building.
7 His name is Damir Mujahodzic. He indicated that there
8 was someone up in the building.

9 Q. Where -- withdrawn.

10 Did you and Mr. Damir go anywhere within this
11 building?

12 A. Yes. We went to apartment B-602.

13 Q. And what, if anything, did you encounter -- did
14 anyone -- did you enter into the apartment when you got,
15 to the unit?

16 A. When we got to the apartment B-602, the
17 superintendent opened the door with the key. And when
Line 18 we opened the apartment, we did see a male black wearing,
Line 19 a black jacket, red bookbag. He was sleeping on the
20 floor.

Line 21 Q. You mentioned there was a red bookbag?

22 A. Yes.

23 Q. Where was it?

Line 24 A. It's was in the next room on the left.)

25 Q. Within that unit?

1 A. In that unit, yes.

2 Q. And did you observe any credit cards on the
3 counter in that unit?

4 A. Yes. In the kitchen area there were several
5 credit cards, one indicating -- one Capital One, Chase,
6 a Discover card.

7 Q. Do you recall whose name was bearing on those
8 credit cards?

9 A. Yes.

10 Q. Whose name was that?

11 A. Abdul Javed.

12 Q. Did you also observe a key on the counter inside
13 of that location?

14 A. Yes.

15 Q. Do you recognize who that key belonged to?

16 A. Yes.

17 Q. Where --

18 A. It was belonging to apartment 3 --

19 Q. Would it help to look at your --

20 A. Yes, thank you.

21 Q. Does the unit B-306 ring a bell?

22 A. Yes.

23 Q. So that key, you said, went to unit B-306?

24 A. Yes.

25 Q. That unit, was that that within the same building

1 that you were in?

2 A. Yes.

3 Q. Did you ever learn the individual's name who you
4 found sleeping in unit B-602?

5 A. Yes.

6 Q. What was that individual's name?

7 A. Alexander Zion.

8 Q. Did you also eventually learn that individual's
9 date of birth?

10 A. Yes.

11 Q. Can you please tell us what his date of birth is?

12 A. July 16, 1999.

13 Q. I'm sorry, Officer. Can you just tell us who the
14 credit card had the name bearing on them, please?

15 A. Abdul Javed.

16 MS. CATINELLA: Okay. Thank you. I have no
17 further questions of this witness. Do any
18 members of the jury have any questions? Seeing
19 no hands and hearing no voices, the witness is
20 excused. Thank you, officer.

21 (WITNESS EXCUSED)

22

23

24

25

EXHIBIT B
Chase Freedom + Sapphire
+
EBT Card

M. C. 18

PAGE 11
18

Line 1 MS. CANTINELLA: First, I am deeming this
2 marked Grand Jury Exhibit 2 for Identification.
3 It is the Supporting Deposition signed by Abdul
4 Javed, dated 10/24/2023 and the sworn affirmation
5 at the bottom read as follows: False statements
6 made herein are punishable as a Class A
7 Misdemeanor pursuant to Section 210.45 of the
8 Penal Law.

9 With that, I deem this Grand Jury Exhibit 2
10 in Evidence and I will read in pertinent part.
11 It is entitled People of the State of New York
12 against Zion Alexander. Indictment number
13 2187/2023. I am Abdul Javed of 10-46 44 Drive,
14 apartment B306, Queens County, New York 11101,
15 being duly sworn deposed and say that on October
16 16th through 18th 2023, I was the owner of the
17 following described property: One Capital One
18 credit card, one Chase credit card, one Discover
19 credit card, one key to apartment B306 of 10-46
20 44 Drive, Queens, New York 11101.

21 That the defendant did not have any right to
22 possess -- to the possession of said property
23 superior or equal to mine. Again, signed by
24 Abdul Javed, that is Grand Jury Exhibit 2. That
Line 25 concludes the evidence that you will see and hear

Exhibit "C"
The Indictment Count's

Please REFER TO PAGE #2, ("First Count") & ("Second Count")

AS you can see the only two counts on my indictment officially charges me directly against The (CNR) "DAMIR, MUJAHODZIC" which supports my claim that my whole indictment or atleast the first two charges is invalid. How could it possibly be a Burglary Against someone who never complaint, testified about a Burglary in the first place? As you can see now from the grand jury minutes He testified that he is a simple Building manager who claimed to be some sort of witness of a Burglary, a Burglary that in this case, never happened directly against him or his dwelling personally. So how/why, do or why would, a jury believe in something that never happened. To vote out against all facts?

This Indictment should have been dismissed based on lack of evidence to support Burglary 2nd Degree.

S U P R E M E C O U R T O F T H E S T A T E O F N E W Y O R K
C O U N T Y O F Q U E E N S

THE PEOPLE OF THE STATE OF NEW YORK

AGAINST

ZION ALEXANDER - VFO
DEFENDANT
CR-030633-23QN
NYSID# 12541586Y

FILED:
INDICTMENT NO. 2187/2023

PL 140.25-2	BURGLARY IN THE SECOND DEGREE (1-2) 2
PL 155.30-4	GRAND LARCENY IN THE FOURTH DEGREE (3-5)
PL 165.45-2	CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE (6-8)
PL 140.15-1	CRIMINAL TRESPASS IN THE SECOND DEGREE (9)
PL 155.25	PETIT LARCENY (10)
PL 165.40	CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FIFTH DEGREE (11)

A TRUE BILL

FOR

DISTRICT ATTORNEY

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF BURGLARY IN THE SECOND DEGREE COMMITTED AS
FOLLOWS:

* THE DEFENDANT, ON OR ABOUT OCTOBER ~~16~~ 2023 IN THE COUNTY OF
QUEENS, KNOWINGLY ENTERED OR REMAINED UNLAWFULLY IN THE DWELLING OF
DAMIR MUJAHODZIC WITH THE INTENT TO COMMIT A CRIME THEREIN.

SECOND COUNT

* THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF BURGLARY IN THE SECOND DEGREE COMMITTED AS
FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 18, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, KNOWINGLY ENTERED OR
REMAINED UNLAWFULLY IN THE DWELLING OF DAMIR MUJAHODZIC WITH THE
INTENT TO COMMIT A CRIME THEREIN.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE FOURTH DEGREE COMMITTED AS
FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 16, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, STOLE A CHASE CREDIT CARD FROM
ABDUL JAVED.

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE FOURTH DEGREE COMMITTED AS
FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 16, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, STOLE A DISCOVER CREDIT CARD
FROM ABDUL JAVED.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF GRAND LARCENY IN THE FOURTH DEGREE COMMITTED AS
FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 16, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, STOLE A CAPITAL ONE CREDIT
CARD FROM ABDUL JAVED.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE
FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 16, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, WITH INTENT TO BENEFIT HIMSELF
OR A PERSON OTHER THAN AN OWNER THEREOF OR TO IMPEDE THE RECOVERY BY
AN OWNER THEREOF, KNOWINGLY POSSESSED STOLEN PROPERTY AND THE PROPERTY
CONSISTED OF A CHASE CREDIT CARD, OWNED BY ABDUL JAVED.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE
FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 16, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, WITH INTENT TO BENEFIT HIMSELF
OR A PERSON OTHER THAN AN OWNER THEREOF OR TO IMPEDE THE RECOVERY BY
AN OWNER THEREOF, KNOWINGLY POSSESSED STOLEN PROPERTY AND THE PROPERTY
CONSISTED OF A DISCOVER CREDIT CARD, OWNED BY ABDUL JAVED.

~~*~~


Repetitive

EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE
FOURTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 16, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, WITH INTENT TO BENEFIT HIMSELF
OR A PERSON OTHER THAN AN OWNER THEREOF OR TO IMPEDE THE RECOVERY BY
AN OWNER THEREOF, KNOWINGLY POSSESSED STOLEN PROPERTY AND THE PROPERTY
CONSISTED OF A CAPITAL ONE CREDIT CARD, OWNED BY ABDUL JAVED.

NINTH COUNT

 THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL TRESPASS IN THE SECOND DEGREE
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT OCTOBER 17, 2023 IN THE COUNTY OF
QUEENS, KNOWINGLY ENTERED OR REMAINED UNLAWFULLY IN THE DWELLING OF
DAMIR MUJAHODZIC.

TENTH COUNT

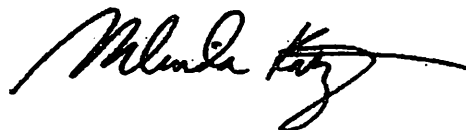
THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF PETIT LARCENY COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 16, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, STOLE PROPERTY, TO WIT: A
KEY FROM ABDUL JAVED.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE
FIFTH DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT AND BETWEEN OCTOBER 16, 2023 AND
OCTOBER 19, 2023 IN THE COUNTY OF QUEENS, WITH INTENT TO BENEFIT
HIMSELF OR A PERSON OTHER THAN AN OWNER THEREOF OR TO IMPEDE THE
RECOVERY BY AN OWNER THEREOF, KNOWINGLY POSSESSED STOLEN PROPERTY, TO
WIT: A KEY, OWNED BY ABDUL JAVED.



MELINDA KATZ
DISTRICT ATTORNEY

PERSONAL opinion

COF2

plaintiff (ZION, Alexander)

IS filing / seeking, AN Emergency Injunction As Related to the pending Criminal matter In Supreme Criminal Court, Due To Be HAVE BEEN EFFECTED BY Irreparable Harm Caused By Direct violation of Criminal proceeding, which is why the "Emergency Injunction" is needed. with Hopes that this Court will Balance The Equities of my Argument, FOR I'm NOT A violent person, who never committed an violent act and thir fore It's Not In the public Interest to keep my liberty In Bodage. My First Amendment HAVE Been Hevily effutated By The Criminal matter Injustice please Consider 28 U.S.C.S §1441(c) To Hopefully rule out In my FAVOR.

In my personal opinion, The Courts of Criminal proceeding Have proculuded A defective Indictment, used false statements, purposely withheld evidence, Denied All my Arguments / motions, will NOT Allow me to Excuse / Fire my lawyer who is Ineffective and prejudice Against me, All constitutas my right. the Judge even wont let me exercise my rights to represent my self willingly, Please NOTE I've Been trying To fire my lawyer for over 6 months knowingly and willing ~~on~~ on the record Too. I've Singly Exhausted almost Everything At the pretrial stage In order To Attempt to preserve my right to A Fair trial ✓

Personal opinion.

2 of 2

But I unfortunately believe that would NOT be the case for me, The Courts/DA Refuses to Inform the defendant (plaintiff) The reasons for their denial of All motions I tried to Raise, NY do not have A Policy/Remedy For this immediate issue. It's yet Another reason why I ASK this Court to Inject into the proper pending Criminal matters, For It may Continue If AN Injunction does not occur.

I Also would like to Ask this Court For It's Patiences and True and Fair Decision of my wishes

Thank you
Zion Alexander
(plaintiff)

11/16/2024

III. Relief: State what relief you are seeking if you prevail on your complaint.

\$3,000,000 dollars, New policy on Arrest that would require
A certain amount of Facts and Evidence Instead of Hearsay
Testimony Before an arrest may be started, An Injunction
Relief, In to A Emergency pending matter In state court,
Fine Anyone Held liable for ^{malicious} prosecution, and what ever
Else The Courts may Just deem proper.

I declare under penalty of perjury that on 11/16/2024, I delivered this
(date)
complaint to prison authorities at Grac to be mailed to the United
(name of prison)
States District Court for the Eastern District of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 11/16/2024


Signature of Plaintiff

Name of Prison Facility or Address if not incarcerated

09-09 Hazen street, East Elmhurst,
Queens, New York, 11370
Address

441 2303517
Prisoner ID#

210N ALEXANDER (441 2303514)
09-09 HAZEN STREET
New York, Queens, East Elmhurst,
11370

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OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
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NOV 27, 2024

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RDC 99



UNITED STATES DISTRICT COURT
EASTERN DISTRICT COURT OF NEW YORK
225 Cadman PLAZA, EAST, Brooklyn, NY 11201

URGENT MATTER

ATTENTION: PRO SE OFFICE

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ DEC 04 2024 ★

BROOKLYN OFFICE

